

1 MICHAEL C. MILLS, ESQ.
Nevada Bar No. 003534
2 BAUMAN LOEWE WITT & MAXWELL
3650 N. Rancho Drive, Suite 114
3 Las Vegas, NV 89130
Phone: 702-240-6060
4 Fax: 702-240-4267
Email: mmills@blwmlawfirm.com

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6 Attorneys for Defendant,
Bodega Latina Corporation
7 dba El Super

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9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 LUZ T. MACIAS, Individually,
12 Plaintiff,

Case No.: 2:17-cv-02347-APG-PAL

13 vs.

14 BODEGA LATINA CORPORATION, d/b/a
EL SUPER, a Foreign Corporation; DOES
15 1 through 20; ROE CORPORATIONS 1
through 20, inclusive,
16 Defendant.
17

18 **STIPULATION AND ORDER TO EXTEND**
19 **DISCOVERY PLAN AND DEADLINES**
(First Request)

20 Plaintiff Isabel Torres *In Proper Person* and Defendant Bodega Latina
21 Corporation, by and through their counsel, and pursuant to Local Rule 26-4, stipulate to
22 modify their discovery plan as follows:

23 1. Plaintiff filed her Complaint on August 1, 2017 in the Eighth Judicial
24 District Court, Case No. A-17-759247-C. Defendant filed their Answer and Jury
25 Demand on August 24, 2017. This case was removed to the United States District
26 Court on September 7, 2017. Plaintiff's counsel filed a Motion to Withdraw and it was
27 granted on October 23, 2017. A status hearing was held on January 4, 2018.

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PROPOSED STIPULATION AND ORDER TO EXTEND
DISCOVERY PLAN AND SCHEDULING ORDER

- PAGE 1 OF 4 -

2. The parties held their F.R.C.P. 26 conference on January 5, 2018 and filed their Stipulated Discovery Plan and Scheduling Order on January 17, 2018. In this original plan, the parties agreed to the following dates:

Last Day to Amend Pleadings:	04/04/2018
Expert Disclosure Deadline:	05/04/2018
Interim Status Report Deadline:	05/04/2018
Rebuttal Expert Disclosure:	06/04/2018
Discovery Cut-Off:	07/03/2018
Dispositive Motions Deadline:	08/02/2018
Pre-Trial Order:	09/04/2018

The initial discovery plan was signed by United States Magistrate Peggy A. Leen, January 23, 2018.

3. In compliance with Local Rule 26-4, the parties provide the following information regarding the discovery status:

(a) Discovery Completed pursuant to Fed. R. Civ. P. 26(a):

Defendants:

Interrogatories to Plaintiff	11/01/2017
Request for Production to Plaintiff	11/01/2017
Initial Disclosure	11/03/2017
First Supplemental Disclosure	01/22/2018
Second Supplemental Disclosure	02/27/2018
Third Supplemental Disclosure	03/28/2018
Fourth Supplemental Disclosure	04/16/2018

Plaintiffs:

Initial Disclosure	10/02/2017
Plaintiff's Answers to Interrogatories	03/09/2018
Plaintiff's Responses to Request	

1 to Produce 03/09/2018

2 (b) Discovery that remains to be completed:

- 3 • Defendant needs to obtain Plaintiff's remaining medical records.
- 4 • Defendant needs to schedule an Independent Medical Examination of
- 5 Plaintiff.
- 6 • The parties need to designate experts and rebuttal experts and exchange
- 7 reports.
- 8 • The parties need to conduct the depositions of Plaintiff and Defendant.
- 9 • The parties need to conduct the depositions of Plaintiff's experts and
- 10 Defendant's experts.

11 (c) Reasons why discovery was not completed:

12 It took longer than was expected to gather all of Plaintiff's medical records and
13 we are still gathering the medical records.

14 Plaintiff has been on maternity leave.

15 Defendant is still awaiting receipt of medical records and imaging studies from
16 the radiologists and medical providers. But better than 50% of the records have been
17 received.

18 The parties propose a 45-day extension to complete the remaining discovery.
19 those dates will be:

20	Last Day to Amend Pleadings:	05/21/2018
21	Expert Disclosure Deadline:	06/18/2018
22	Interim Status Report Deadline:	06/18/2018
23	Rebuttal Expert Disclosure:	07/19/2018
24	Last Day to Amend DPSO:	07/30/2018
25	Discovery Cut-Off:	08/17/2018
26	Dispositive Motions Deadline:	09/17/2018
27	Pre-Trial Order:	10/19/2018

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2 CONCLUSION

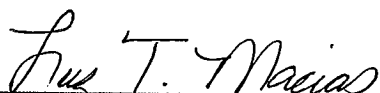
3 For the foregoing reasons, the parties herein respectfully request this Honorable
4 Court to enter its Order to Extend Discovery Plan and Deadlines.

5 Approved as to form and content:

6 Dated: May 2nd, 2018

Dated: May 2nd, 2018

7 BAUMAN LOEWE WITT & MAXWELL, PLLC

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9 

/s/ Michael C. Mills

10 LUZ MACIAS
11 1936 Sunset Circle, Apt. F
Henderson, NV 89011
12 Phone: 702-612-1068
Email: lmacias@lvnlaw.com
In Proper Person

MICHAEL C. MILLS, ESQ.
Nevada Bar No. 003534
3650 N. Rancho Dr., Ste. 114
Las Vegas, NV 89130
Phone: 702-240-6060
Fax: 702-240-4267
Attorney for Defendant
Bodega Latina Corporation, dba El Super

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15 IT IS SO ORDERED.

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19 UNITED STATES DISTRICT COURT JUDGE,
20 UNITED STATES DISTRICT COURT MAGISTRATE JUDGE

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22 DATED: May 8, 2018